

# EXHIBIT A

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

ANTHONY HART,

PLAINTIFF,

vs.

Case No. 16-cv-10253

Hon. Denise Page Hood

Mag. Judge Elizabeth A. Stafford

HILLSDALE COUNTY, a Municipal Corporation; AGENTS CHRISTINE WAHTOLA, KWINN LEVA, and LT. TIMOTHY PARKER; CITY OF HILLSDALE and OFFICER TODD HOLTS; MICHIGAN STATE POLICE ANALYSTS MELISSA MARINOFF and MARCI KELLY, in their individual capacities, WATCH SYSTEMS, L.L.C., a Louisiana corporation; ATTORNEY KIMBERLEY BURGER, KB LAW OFFICER, P.C. and PARKER HAYES & LOVINGER, P.C., all jointly and severally,

DEFENDANTS.

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**AFFIDAVIT**

I, Lou Luzynski, being over the age of 18 and first duly sworn, depose and state the following based on my personal knowledge.

1. I serve as the Managing Partner of Watch Systems, L.L.C. ("Watch Systems").

In my capacity as Managing Partner, I am familiar with the company's

operations and contracts. I am also familiar with the products and services that Watch Systems provides, including OffenderWatch®.

2. Watch Systems is a Louisiana limited liability company with its principal place of business in Covington, Louisiana. All of Watch System's offices and employees are located in Covington, Louisiana, and not any other state, including Michigan.
3. Watch Systems offers software solutions, such as OffenderWatch®, to assist law enforcement and state agencies in maintaining sex offender registries.
4. In January of 2012, representatives of Michigan State Police ("MSP") contacted Watch Systems about the possibility of using OffenderWatch® to maintain its sex offender registry.
5. After remote negotiations, Watch Systems and MSP reached an agreement (the "Agreement") to provide access to OffenderWatch®, effective on November 15, 2012. After the Agreement was reached, MSP transferred all of its sex offender data onto OffenderWatch®.
6. Watch Systems' responsibilities under the Agreement are limited to providing MSP staff with log in information, training the MSP Staff, providing help desk support for MSP staff, and general troubleshooting functions to ensure OffenderWatch® is operating properly. All of these services, with the

exception of a brief in-person training, are conducted from Watch Systems' offices in Covington, Louisiana.

7. MSP has total control over the content of the sex offender data. MSP staff monitor and control the sex offender registry, add offenders to the registry, and remove offenders as needed. Watch Systems does not have any involvement in regulating the content. Watch Systems' obligations under the Agreement are limited to software management and IT services.
8. "Other than the Agreement with the Michigan State Police, Watch Systems does not have any contract with any other law enforcement agency or other party located in the State of Michigan."

COUNTY OF ST Tammany  
STATE OF Louisiana

BEFORE ME, the undersigned authority, on this 22 day of  
July, 2016, personally appeared LOU LUZYNSKI, known to me  
to be the person whose name is subscribed to the above and foregoing  
Affidavit, who, being by me the first duly sworn, upon oath states and  
acknowledges to me that the facts set forth in the foregoing Affidavit are true and  
correct to the best of my knowledge and belief.

Given under my hand and seal of office this 22 day of  
July, 2016.

  
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LOU LUZYNSKI

  
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NOTARY PUBLIC

In and for the State of Louisiana  
Bar Roll/Notary Number JULIAN J. RODRIGUE, JR.  
My Commission expires NOTARY PUBLIC  
Printed Name BAR ROLL #11373  
MY COMMISSION IS FOR LIFE